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of Britney Jean Spears, on behalf of  
9 Defendant Britney Jean Spears

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**  
12

13 SAM LUTFI, an individual,

14 Plaintiff,

15 vs.

16 LYNNE IRENE SPEARS, an individual,  
JAMES PARNELL SPEARS, an  
17 individual, BRITNEY JEAN SPEARS, an  
individual; and DOES 1 through 25,  
18 inclusive,

19 Defendants.  
20

CASE NO. BC 406904

*Assigned to the Honorable Suzanne G.  
Bruguera, Dept. 71*

**EXCERPTS FROM VIDEO  
DEPOSITION OF SAM LUTFI  
DISPLAYED TO JURY ON OCTOBER  
24, 2012 AND OCTOBER 25, 2012**

Action Filed: February 3, 2009  
Trial Date: October 2, 2012

21 **TRIAL PROCEEDINGS ON OCTOBER 24, 2012:**  
22

Reference In Reporter's Transcript of October 24, 2012 to Excerpt From Video Deposition of Sam Lutfi Played to Jury	Corresponding Referenced Excerpt From Video Deposition of Sam Lutfi Played to Jury
p. 141, ll. 1-25	Vol. 7, p. 1088, ll. 12-19
p. 142, ll. 5-14	Vol. 7, p. 1089, ll. 6-10
p. 142, ll. 19-28	Vol. 7, p. 1089, ll. 6-21

2909632.1

TRANSCRIPTION OF EXCERPTS OF VIDEO DEPOSITION OF SAM LUTFI DISPLAYED TO JURY ON  
OCTOBER 24, 2012 AND OCTOBER 25, 2012

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

NOV 01 2012

John A. Clarke, Associate Justice/Clerk  
By GLORIETTA ROBINSON, Deputy

1	<b>Reference In Reporter's Transcript of</b>	<b>Corresponding Referenced Excerpt From</b>
2	<b>October 24, 2012 to Excerpt From Video</b>	<b>Video Deposition of Sam Lutfi Played to</b>
3	<b>Deposition of Sam Lutfi Played to Jury</b>	<b>Jury</b>
4	p. 146, ll. 1-14	Vol. 7, p. 1090, l. 8 - p.1091, l. 5
5	p. 146, l. 20 – p. 147, l. 3	Vol. 7, p. 1092, ll. 2-5; p. 1092, ll. 13-23
6	p. 147, l. 28 – p. 148, l. 9	Vol. 7, p. 1107, ll. 7-9
7	p. 149, l. 21 – p. 150, l. 3	Vol. 7, p. 1111, ll. 14-21
8	p. 150, ll. 16-26	Vol. 7, p. 1123, ll. 12-17
9	p. 151, ll. 2-8	Vol. 7, p. 1124, ll. 2-9
10	p. 152, l. 20 – p. 153, l. 5	Vol. 6, p. 1037, ll. 4-15
11	p. 154, ll. 19-27	Vol. 7, p. 1065, ll. 16-20

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**TRIAL PROCEEDINGS ON OCTOBER 25, 2012:**


<b>Reference In Reporter's Transcript of October 25, 2012 to Excerpt From Video Deposition of Sam Lutfi Played to Jury</b>	<b>Corresponding Referenced Excerpt From Video Deposition of Sam Lutfi Played to Jury</b>
p. 7, ll. 11-23	Vol. 7, p. 1108, l. 21 – p. 1109, l. 6
p. 8, ll. 17-24	Vol. 7, p. 1108, ll. 12-14
p. 9, l. 20 – p. 10, l. 4	Vol. 6, p. 995, ll. 9-16
p. 11, ll. 15-26	Vol. 1, p. 61, l. 14 – p. 62, l. 17
p. 11, l. 27 – p. 12, l. 7	Vol. 1, p. 45, l. 7 – p. 46, l. 2
p. 17, ll. 3-22	Vol. 6, p. 1041, ll. 4-8
p. 20, ll. 8-21	Vol. 1, p. 173, ll. 16-17
p. 25, l. 13 – p. 26, l. 6	Vol. 1, p. 108, l. 21 – p. 109, l. 4; p. 109, ll. 10-25
p. 26, l. 7 – p. 27, l. 3	Vol. 1, p. 110, ll. 10-12; p. 110., l. 24 – p. 111, l. 7
p. 28, l. 22 – p. 29, l. 6	Vol. 1, p. 159, ll. 19-23
p. 29, ll. 11-17	Vol. 1, p. 156, ll. 9-18
p. 30, ll. 18-28	Vol. 6, p. 1034, ll. 1-21
p. 39, ll. 7-13	Vol. 7, p. 1164, ll. 22-25
p. 42, l. 25 – p. 43, l. 4	Vol. 7, p. 1191, ll. 7-11
p. 43, l. 26 – p. 44, l. 8	Vol. 7, p. 1192, ll. 3-11
p. 44, l. 18 – p. 45, l. 5	Vol. 1, p. 140, ll. 12-13; p. 140, ll. 15-16; p. 140, ll. 18-19; p. 140, l. 25 – p. 141, l. 6
p. 45, l. 24 – p. 46, l. 8	Vol. 7, p. 1146, ll. 12-24
p. 46, ll. 13-20	Vol. 1, p. 163, ll. 18-21
p. 93, l. 27 – p. 94, l. 3	Vol. 5, p. 877, ll. 9-12

1	Reference In Reporter's Transcript of	Corresponding Referenced Excerpt From
2	October 25, 2012 to Excerpt From Video	Video Deposition of Sam Lutfi Played to
3	Deposition of Sam Lutfi Played to Jury	Jury
4	p. 94, l. 9 – p. 95, l. 3	Vol. 5, p. 878, ll. 1-8

6 DATED: October 31, 2012

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 NESSIM, DROOKS & LINCENBERG, P.C.

11 By:

  
 \_\_\_\_\_  
 Joel E. Boxer

Attorneys for James P. Spears and Andrew M.  
 Wallet as Co-Conservators of the Estate of  
 Britney Jean Spears, on behalf of Defendant  
 Britney Jean Spears

11/01/2012

SUPERIOR COURT OF CALIFORNIA  
FOR LOS ANGELES COUNTY

SAM LUTFI, an individual,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. BC 406904
	)	
LYNNE IRENE SPEARS, an	)	
individual, et al.,	)	
	)	
Defendants.	)	
	)	

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CONFIDENTIAL

SUBJECT TO PROTECTIVE ORDER

VOLUME I

DEPOSITION OF SAM LUTFI

APRIL 25, 2011

⊛ Susan Edwards, CSR No. 13051  
319195

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11/01/2012

1 Q.. Before or after you were involved with  
2 Ms. Spears?

3 A. You're asking me when was the last time I spoke  
4 to Ted before?

5 Q. Was it within the last four years?

6 A. I can't recall.

7 Q. What background, if any, did you have in the  
8 motion picture industry prior to being involved with the  
9 "Circles" production in 1998?

10 A. Well, I was born and raised in Los Angeles.  
11 I'm a native Angeleno. It -- film is kind of in your  
12 blood if you have a liking for it. I've read the trades  
13 for well over 15 years, keep up to date on most things  
14 that are going on in the industry.

15 I have lots of friends that are in the  
16 industry. It's just something that you learn via  
17 osmosis, just being raised in Los Angeles.

18 Q. Have you taken any classes in film prior to  
19 working on "Circles"?

20 A. I don't remember taking any classes in film  
21 particularly.

22 Q. You attended USC for a period of time. Were  
23 you a student in the film school?

24 A. No, sir.

25 Q. Have you taken any classes on films since

1 leaving USC?

2 A. Not that I can recall.

3 Q. Prior to working on "Circles," did you work in  
4 the film industry in Los Angeles?

5 A. Not that I recall.

6 Q. Other than working on "Circles" and on  
7 "Blattela," had you ever worked on a film?

8 A. Just a short film.

9 Q. Okay. What was the name of the short film?

10 A. I believe it was "Crossing Cords."

11 Q. In sequence when do you place that in  
12 relationship to working on "Circles" and working on  
13 "Blattela"?

14 A. I really can't remember when that was. I can't  
15 recall, sir.

16 Q. What did you do on "Crossing" -- cards?

17 A. "Cords."

18 Q. -- "Cords"?

19 A. I was an associate producer.

20 Q. Who produced it?

21 A. Ben Affleck, I believe.

22 Q. You said it was a short film. Did you see the  
23 final print of the film?

24 A. Yes, sir.

25 Q. How long was the film?



1 Q. When was the last time you had contact with Len  
2 Wiseman?

3 A. I don't remember when. I can't recall any  
4 specifics of that.

5 Q. Last five years?

6 A. May have been approximately a year ago.

7 Q. Do you know what he was doing?

8 A. I don't remember.

9 Q. Okay. Other than what you've told us this  
10 morning, did you have any other experience in the  
11 entertainment industry before you met Britney Spears?

12 A. There may have been other experiences, but at  
13 the moment, that's all that comes to mind.

14 Q. All right. Well, you've told us you were a  
15 manager for Len Wiseman, but you didn't get paid by him;  
16 is that right?

17 A. Yes, sir.

18 Q. And you told us you worked on some music  
19 videos, but you're not sure if you got paid; is that  
20 right?

21 A. I was supposed to get paid, but I don't  
22 remember if I got paid all the time, sir.

23 Q. And you worked on two commercial specs, and you  
24 didn't get paid for that; correct?

25 A. To the best of my knowledge.

1 Q. And you worked on two feature-length films, and  
2 you're not sure if you got paid on those?

3 A. That's correct, sir.

4 Q. And you worked on a one -- a short film and you  
5 don't think you got paid for that?

6 A. I don't remember, sir.

7 Q. Anything else you did in the entertainment  
8 industry prior to the time you met Ms. Spears in the  
9 early part of 2007?

10 A. Like I said, I don't remember.

11 Q. Excluding the work you did in the entertainment  
12 industry and the work you did for your mother's gas  
13 station company, have you ever done any other work for  
14 compensation?

15 A. I believe so.

16 Q. What other work?

17 A. At the moment I can't remember.

18 Q. I want to focus on 2007 and 2008. Did you keep  
19 a diary or any notation of any kind on a daily basis of  
20 what you were doing during the days of 2007 and 2008?

21 A. No, sir.

22 Q. Did you keep a journal of any kind of what you  
23 were doing in 2007 and 2008?

24 A. No, sir.

25 Q. Did you keep any kind of computerized record

1 divorce and that she wanted to -- she was advising  
2 Britney to find new counsel. I don't remember when that  
3 was, but I believe she was still in the picture at the  
4 time.

5 Q. All right. Let's try and break this down.

6 You say for most of September 2007, you and  
7 Ms. Spears were not in regular contact.

8 Is that a fair statement?

9 A. To the best of my knowledge, yes.

10 Q. Okay. When you say, "Most of September 2007,"  
11 can you give me a better estimate? Was it three out of  
12 the four weeks? Two weeks? Two weeks in a --

13 A. I can't recall. It may have been two or three  
14 weeks. I don't recall.

15 Q. But your best recollection, around two to three  
16 weeks around September 2007, you and Ms. Spears were not  
17 in contact. Is that fair?

18 A. Yes, sir.

19 Q. Okay. And you believe one of the reasons that  
20 Ms. Spears -- strike that.

21 Did Ms. Spears break off contact with you? Or  
22 did you break off contact with her?

23 A. I don't remember the specifics, but I was  
24 somewhat upset with her behavior, and I left her house.

25 Q. Had you been more or less living there

1 full-time at that point in time?

2 A. I believe I was, yes.

3 Q. When did, approximately, did that start?

4 A. I don't remember, no.

5 Q. Had it been months that you had been living  
6 there?

7 A. No.

8 Q. Several weeks?

9 A. Several weeks.

10 Q. Okay. Something happened which caused a bit of  
11 a spat between the two of you, and it was sort of a  
12 mutual decision that you get out of her life for a  
13 while?

14 A. It was a disagreement. It was more my  
15 decision.

16 Q. Okay. And you observed what you thought was  
17 some reaction or action by Ms. Spears that indicated to  
18 you she was taking some illegal drugs; is that right?

19 A. Yes, sir.

20 Q. And you spoke to Gary Stiffelman and Laura  
21 Wasser about that?

22 A. Yes, sir.

23 Q. Did you tell Ms. Spears that you were going to  
24 tell Mr. Stiffelman about this before you contacted him?

25 A. Yes, sir.

1 Q. Did you tell Ms. Spears that you were going to  
2 tell Laura Wasser about this before you contacted Laura  
3 Wasser?

4 A. Yes, sir.

5 Q. Who did you contact first? Gary Stiffelman or  
6 Laura Wasser?

7 A. I can't remember.

8 Q. Contacted them by telephone?

9 A. I don't remember.

10 Q. What did you tell Gary Stiffelman about  
11 Ms. Spears' conduct?

12 A. I don't recall any of the specifics, sir.

13 Q. Now, you knew Mr. Stiffelman was -- was primary  
14 entertainment counsel for Ms. Spears at the time; is  
15 that right?

16 A. I was told that he was her attorney in the past  
17 but that she may have let him go prior to that.

18 Q. Who told you that?

19 A. Britney.

20 Q. So you knew Mr. Stiffelman either was or had  
21 recently been Mr. -- Ms. Spears' lawyer at the time you  
22 contacted him?

23 A. Actually, I don't recall.

24 Q. But you knew he had some kind of connection as  
25 counsel for Ms. Spears either recently or currently that

1 caused you to call Mr. Stiffelman and tell him this  
2 troubling news; is that right?

3 A. To the best of my knowledge, yes.

4 Q. You were sufficiently upset about Ms. Spears'  
5 conduct that you thought some attorney needed to be told  
6 about her; is that right?

7 A. Yes, sir.

8 Q. Why?

9 A. She told me the children were on their way  
10 over, and she told me what kind of drugs she was doing.

11 Q. What did she tell you?

12 A. She said that she was taking meth.

13 Q. Had you had any experience with individuals  
14 taking meth prior to that?

15 A. Can you define what that means?

16 Q. To the best of your knowledge, had anyone  
17 around you taken meth so you observed the reaction  
18 people have when they take meth?

19 A. Yes, sir.

20 Q. What kind of experience have you had with meth?

21 A. I've witnessed people take meth.

22 Q. Okay. So Ms. Spears told you that the children  
23 were on their way to a visitation; is that correct?

24 A. To the best of my knowledge, yes.

25 Q. That happened from time to time that you were

1 Q. And she had to agree to five years until you  
2 received the Exhibit 4; is that correct?

3 A. She didn't agree to five years in this.

4 Q. When you say that you had a management contract  
5 with Britney Spears, do you believe it started when you  
6 received Exhibit 4?

7 MR. SCHLEIMER: Calls for speculation. Calls for a  
8 legal conclusion.

9 THE WITNESS: I don't know if I want to speculate to  
10 that.

11 BY MR. BOXER:

12 Q. Do you have any belief as to when your contract  
13 with Britney Spears started?

14 MR. SCHLEIMER: Calls for a legal conclusion.

15 THE WITNESS: Again, I don't know. I don't know how  
16 to answer that.

17 BY MR. BOXER:

18 Q. You have no belief, as you sit here now, when  
19 your contract with Britney Spears started?

20 MR. SCHLEIMER: Calls for a legal conclusion. Asked  
21 and answered. Asked and answered. Asked and answered.

22 THE WITNESS: I'm sorry.

23 BY MR. BOXER:

24 Q. Please answer the question.

25 A. Yeah, I don't recall.

1 Q. You don't recall what?

2 A. If that's the day that I thought that I had a  
3 contract.

4 Q. When do you recall you thought you had a  
5 contract with Britney Spears?

6 A. I can't recall right now.

7 Q. What event occurred that caused you to think  
8 you had a contract with Britney Spears?

9 A. I discussed this with her probably I think it  
10 was later that evening when I came over.

11 Q. What did you discuss with Ms. Spears that  
12 evening?

13 A. That I brought this over and asked who she  
14 talked about, if she's discussing this with her lawyer,  
15 but I said that that's fine. And I explained to her I  
16 can't talk to the judge, but that's what her lawyers are  
17 for, and she said, "Okay." I said I could testify as a  
18 witness, though.

19 And -- and she just giggled and said, "Great.  
20 That sounds great." Shook my hand. I gave her a hug,  
21 and I think we went to the gym afterwards. I don't  
22 remember.

23 Q. When you said she discussed this with her  
24 lawyer, do you mean the contract or your talking to the  
25 judge?



1 midst of negotiating a personal management contract with  
2 Ms. Spears?

3 A. I don't recall ever speaking to her publicist.

4 Q. About anything?

5 A. Yes.

6 Q. Get back to your conversation that you did  
7 recall a bit of with Howard Grossman sometime after  
8 Exhibit 4, that is, after October 13, 2007.

9 What did you ask Mr. Grossman about getting  
10 paid?

11 A. I don't remember the specifics. It was just a  
12 matter of when I would start getting paid..

13 Q. What's the best you can -- tell me the best  
14 recollection you now have of what you said to  
15 Mr. Grossman in that conversation?

16 A. That it would be nice to get paid.

17 Q. Okay. Anything else?

18 A. That's all I remember, sir.

19 Q. Now, you were involved from time to time in  
20 reviewing Ms. Spears' bills with her or expenses?

21 A. Correct.

22 Q. This would be information that was forwarded to  
23 her by Mr. Grossman's office?

24 A. This is information that Mr. Grossman would  
25 bring over to the house.

1 Mr. Grossman at the hospital visit, do you?

2 A. I can't remember.

3 Q. But you place that sometime in January 2008; is  
4 that correct?

5 A. Yes, sir.

6 Q. Okay. Excluding the hospital visit, were all  
7 your other occasions, that, is approximately three to  
8 five times when you met with Mr. Grossman at Britney's  
9 house?

10 A. Such a long time ago. I remember speaking to  
11 him more on the phone now that I think about it. I  
12 don't remember how many times I met Howard Grossman.

13 Q. So it could be fewer than three or five?

14 A. Could be. There -- he would have a messenger  
15 send over bills or pick up checks that were signed at  
16 times. I had to meet that messenger a few times, but,  
17 yeah, I don't remember actually how many times I met  
18 with Howard.

19 Q. On any of times when you met in person with  
20 Mr. Grossman, did you discuss the fact that you had  
21 entered into a contract to be personal manager to  
22 Britney Spears?

23 A. I can't recall, sir.

24 Q. Any of the times when you met in person with  
25 Mr. Grossman, did you discuss the fact that you expected

1 occasion?

2 A. Yeah, I believe so.

3 Q. On how many occasions?

4 A. I don't recall, sir.

5 Q. Did you understand, when you received  
6 Exhibit 4 -- Exhibit 4, that you were entitled to  
7 15 percent of the money Britney Spears then had?

8 A. I'm sorry. That I was entitled to the money  
9 that she had or was earning?

10 Q. Money that she had. That is, did you  
11 understand that the phrase "my money" meant the money  
12 she already had?

13 A. I don't remember, sir.

14 Q. Did you ever see, prior to October 13, 2007,  
15 any financial statement or other document purporting to  
16 list Ms. Spears' current earnings?

17 A. I don't remember.

18 Q. After October 13, 2007, did you receive any  
19 financial statements or other documents purporting to  
20 list Ms. Spears' earnings?

21 A. Not that I recall, sir.

22 MR. SCHLEIMER: Can we take a break, Counsel? I  
23 have to make a phone call.

24 MR. BOXER: I only ask, because we have five minutes  
25 left on the tape, if we can go about five minutes, but

1 that is dated October 13, 2007?

2 MR. SCHLEIMER: Misstates his testimony.

3 THE WITNESS: I don't understand what you just said.

4 BY MR. BOXER:

5 Q. Let me repeat it and then see if you understand  
6 it. If not, I'll try and clarify.

7 A. Thank you.

8 MR. BOXER: Please repeat it.

9 THE REPORTER: Question: "Is it your  
10 recollection that a percentage rate was not  
11 discussed by either you or Ms. Spears before  
12 you received Exhibit 4, the e-mail that is  
13 dated October 13, 2007?"

14 THE WITNESS: No. I'm sorry. I didn't say that.

15 BY MR. BOXER:

16 Q. Okay. Who first suggested a percentage rate?

17 A. I don't remember that.

18 Q. And you don't recall any of the rates that were  
19 suggested; is that correct?

20 MR. SCHLEIMER: Misstates his testimony.

21 THE WITNESS: At the moment I don't recall.

22 BY MR. BOXER:

23 Q. When did you first discuss what the percentage  
24 rate would be of?

25 A. What was the first time we discussed that

DEPOSITION OFFICER'S CERTIFICATE

STATE OF CALIFORNIA )  
 ) ss.  
COUNTY OF LOS ANGELES )

I, M. Susan Edwards, hereby certify:

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I am not financially interested in this action and am not a relative or employee of any attorney of the parties, or of any of the parties. (Civ. Proc. § 2025.320(a))

I am authorized to administer oaths or affirmations pursuant to California Code of Civil Procedure, Section 2093(b) and prior to being examined, the deponent was first placed under oath or affirmation by me. (Civ. Proc. §§ 2025.320, 2025.540(a))

I am the deposition officer that stenographically recorded the testimony in the foregoing deposition and the foregoing transcript is a true record of the testimony given. (Civ. Proc. § 2025.540(a))

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15 as a service or product to be provided to any party or  
16 third party who is financing all or part of the action.  
17 (Civ. Proc. § 2025.320(c))

18  
19 Dated: MAY 9, 2011

20  
21  
22 M. M. Edwards  
23  
24  
25

VOLUME 5

11/01/2012

**SUPERIOR COURT OF CALIFORNIA**

**FOR LOS ANGELES COUNTY**

SAM LUTFI, an individual,	)	
	)	Case No. BC 406904
Plaintiff,	)	
	)	
v.	)	
	)	
LYNNE IRENE SPEARS, an	)	
individual; JAMES PARNELL	)	
SPEARS, an individual; BRITNEY	)	
JEAN SPEARS, an individual; and	)	
DOES 1 through 25, inclusive,	)	
	)	
Defendants.	)	
	)	

**-CONFIDENTIAL-**

**SUBJECT TO PROTECTIVE ORDER**

**VOLUME V**

**DEPOSITION OF SAM LUTFI**

**November 11, 2011**

⊛ **Vivian C. Lane, CSR No. 11339**  
**330984**

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11/01/2011



1 purposes of evidence, it's Exhibit --

2 MR. SCHLEIMER: 502.

3 MR. ADLER: -- 502.

4 BY MR. ADLER:

5 Q Um, did you ever see the published issue of Us  
6 Weekly that's referenced in this article?

7 A I may have. I don't recall if I saw the actual  
8 published issue, sir.

9 Q Were you aware that Us Weekly was reporting  
10 that you had stated that you had given Britney, quote, "a  
11 handful of pills," unquote?

12 A I remember hearing something of this matter.

13 Q Did you, in fact, speak with any reporter,  
14 journalist or blogger who was working with Us Weekly?

15 A That's a broad question. There's many people  
16 that were talking to me. I didn't speak to Us. I would  
17 never speak to Us. This is -- it wasn't unusual that  
18 they would write something about me giving an interview.  
19 They've done this before.

20 Q Did you, in fact, give the interview that  
21 they're referring to here?

22 A To Us Weekly?

23 Q To anybody who would have given it to Us  
24 Weekly.

25 A No, sir.

1 Q Did you ever send Us Weekly any kind of  
2 communication indicating that you didn't give the  
3 interview?

4 A I recall Bryan Freedman writing Us Weekly a  
5 letter of some sort.

6 Q When did you retain Bryan Freedman?

7 A I believe it was either late 2008 or early  
8 2009.

9 Q At any period between February 6th of 2008 and  
10 the point when you retained Bryan Freedman, did you do  
11 anything to communicate to Us Weekly that you had not  
12 said what they had published you had said?

13 A I don't recall if I did or not.

14 Q Did you inform any third party that you had not  
15 say what Us Weekly said you said?

16 MR. SCHLEIMER: You mean, other than his counsel?

17 MR. ADLER: Other than his counsel --

18 MR. SCHLEIMER: Subject to the attorney/client  
19 privilege.

20 MR. ADLER: Right.

21 THE WITNESS: Did I -- I'm sorry.

22 BY MR. ADLER:

23 Q Fair enough. Let me re-ask the question.

24 MR. SCHLEIMER: Okay. The question is did you  
25 communicate to anyone that Us Weekly had fabricated these

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1 I have not, and shall not, offer or provide  
2 any services or products to any party's attorney or  
3 third party who is financing all or part of the  
4 action without first offering same to all parties or  
5 their attorneys attending the deposition and making same  
6 available at the same time to all parties or their  
7 attorneys. (Civ. Proc. § 2025.320 (b))

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9 product consisting of the deposition officer's notations  
10 or comments regarding the demeanor of any witness,  
11 attorney, or party present at the deposition to any  
12 party or any party's attorney or third party who is  
13 financing all or part of the action, nor shall I  
14 collect any personal identifying information about the  
15 witness as a service or product to be provided to any  
16 party or third party who is financing all or part of the  
17 action. (Civ. Proc. § 2025.320 (c))

18  
19 Dated: November 23, 2011  
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24 Vivian C. Lane, CSR #11339  
25

11/01/2012

SUPERIOR COURT OF CALIFORNIA

FOR LOS ANGELES COUNTY

SAM LUTFI, an individual,

Plaintiff,

**v.**

LYNNE IRENE SPEARS, an individual; JAMES PARNELL SPEARS, an individual; BRITNEY JEAN SPEARS, an individual; and DOES 1 through 25, inclusive,

**Defendants .**

**CONFIDENTIAL**

SUBJECT TO PROTECTIVE ORDER

VOLUME VI

DEPOSITION OF SAM LUTFI

November 14, 2011

Vivian C. Lane, CSR No. 11339  
331524

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1 sir.

2 Q Did you assist Ms. Spears in finding Jon  
3 Eardley as a lawyer?

4 A I don't recall if I did that.

5 Q You don't recall one way or the other, or you  
6 don't recall doing that?

7 A I just recall Jon Eardley helping find John  
8 Anderson, sir.

9 Q Since February 1, 2008, have you performed any  
10 services as Ms. Spears's Manager other than what you just  
11 described to us as assisting in finding her a lawyer?

12 A Nothing I -- nothing I can think of at the  
13 moment, sir.

14 Q Do you know of anything that would help refresh  
15 your recollection?

16 A Not at the moment, sir.

17 Q When did you first have any contact with an  
18 attorney named Blair Berk?

19 A I believe it was February 2008.

20 Q Subsequent to the temporary restraining order?

21 A I believe so, sir.

22 Q What was the nature of your first contact with  
23 Ms. Berk?

24 A I believe it was regarding my car that was  
25 taken and all the stuff that was in it.

1 Q Is it your testimony, sir, that you told Howard  
2 Grossman of the compensation arrangements that you had  
3 worked out with Britney Spears as her Manager?

4 A I can't recall if I got into specifics with  
5 Howard.

6 Q Okay. You understood he was the person in  
7 charge of managing her business affairs; is that correct?

8 A Yes, sir.

9 Q And you understand that Howard Grossman was the  
10 person that paid -- or his office paid Ms. Spears's  
11 bills; is that correct?

12 A Yes, sir.

13 Q And you never gave him a copy of any Agreement  
14 between you and Ms. Spears; is that right?

15 A I can't recall if I did or not, sir.

16 Q Sitting here now, you don't recall doing that?

17 A I don't recall, sir.

18 Q And you never sent Mr. Grossman a bill or a  
19 request in writing to be paid as Manager; is that  
20 correct?

21 A Not that I can recall, sir.

22 Q And you never sent Mr. Grossman any text  
23 message or email saying where's my money as her Manager?

24 A Yes, I have, sir.

25 Q Did you do that before 2008?



1 Q Any others?

2 A There may have been, but at the moment, that's  
3 all I recall, sir.

4 Q Well, Ms. Spears didn't tour in 2007, did she?

5 A No, sir.

6 Q To the best of your knowledge, she didn't tour  
7 in 2008 either, correct?

8 A I don't recall if she did or not, sir.

9 Q She didn't tour in January of 2008, correct?

10 A That's right, sir..

11 Q And she didn't tour in the first half of 2008;  
12 isn't that correct?

13 A I believe so, sir.

14 Q You believe that's correct?

15 A Yes, sir.

16 Q Thank you. Now, Ms. Spears has had an  
17 endorsement arrangement with her perfume line since the  
18 early 2003 or 2004 period of time; is that correct?

19 A I believe so, sir.

20 Q What was the nature of the contractual  
21 arrangement that you referred to as the 500 -- \$500,000  
22 contract that Pryor Cashman had her -- had her sign?

23 A I believe it was some sort of T-shirt  
24 merchandising. I can't recall the specifics, sir.

25 Q Did you have anything to do with getting her

1 Q Was that a casual occupation -- a casual event,  
2 or was it something that dominated her time?

3 A It dominated her time, sir.

4 Q How frequently in the June 2007 through  
5 January 2008 period of time would she have meetings or  
6 discussions with lawyers and others about her custody  
7 battle?

8 A Daily.

9 Q Did you find that it affected her emotionally?

10 A I would imagine it would affect anybody  
11 emotionally, sir.

12 Q Did you observe that it affected Ms. Spears  
13 emotionally?

14 A I'm not a doctor, sir.

15 Q Did you not observe any emotional response by  
16 Ms. Spears to the ongoing custody battle?

17 A It was stressful, sir.

18 Q And was it stressful throughout the period  
19 June 2007 through January 2008?

20 A Absolutely.

21 Q Were there periods of time when it was more  
22 stressful?

23 A It all depended. I mean, I suppose the -- the  
24 answer to that question would be yes.

25 Q And what periods of time were -- was it more

DEPOSITION OFFICER'S CERTIFICATE

STATE OF CALIFORNIA )  
 ) ss.  
COUNTY OF LOS ANGELES )

I, Vivian Lane, hereby certify:

I am a duly qualified Certified Shorthand Reporter, in the State of California, holder of Certificate Number CSR 11339 issued by the Court Reporters Board of California and which is in full force and effect. (Bus. & Prof. § 8016)

I am not financially interested in this action and am not a relative or employee of any attorney of the parties, or of any of the parties. (Civ. Proc. § 2025.320(a))

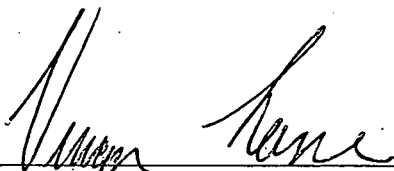
I am authorized to administer oaths or affirmations pursuant to California Code of Civil Procedure, Section 2093(b) and prior to being examined, the deponent was first placed under oath or affirmation by me. (Civ. Proc. §§ 2025.320, 2025.540(a))

I am the deposition officer that stenographically recorded the testimony in the foregoing deposition and the foregoing transcript is a true record of the testimony given. (Civ. Proc. § 2025.540(a))

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2 any services or products to any party's attorney or  
3 third party who is financing all or part of the action  
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13 financing all or part of the action, nor shall I collect  
14 any personal identifying information about the witness  
15 as a service or product to be provided to any party or  
16 third party who is financing all or part of the action.  
17 (Civ. Proc. § 2025.320(c))

18  
19 Dated: December 1, 2011

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11/01/2012



1 way you've just described before the meeting prior to the  
2 time you say that you entered into an oral agreement with  
3 Ms. Spears to be her manager?

4 A I can't recall if I did or not, sir.

5 Q So you don't know which happened first, the  
6 agreement that you claim you entered into in June of 2007  
7 or reading Mr. Passman's book for the first time; is that  
8 correct?

9 A That's correct, sir.

10 Q You've been very good in this deposition of not  
11 answering my questions until I've finished a question,  
12 but I noticed a either tendency for me to drop my voice  
13 or for you to rush into answer. So take your time to  
14 answer and till I finish the question, please.

15 A Yes, sir.

16 Q Thank you, sir. From the time you first met  
17 Ms. Spears in 2007 until February 1, 2008, did you  
18 present to her any opportunities that you originated for  
19 live appearances by her?

20 A No, sir.

21 Q From the time that you first met Ms. Spears in  
22 2007 until February 1, 2008, did you present to  
23 Ms. Spears any opportunities for product or other  
24 endorsements that you originated?

25 A No, sir.

1 Q Who are the music producer or producers you're  
2 referring to in that portion of your First Amended  
3 Complaint?

4 A I believe Jonathan Rotem, sir.

5 Q Anyone else?

6 A I can't recall at the moment, sir.

7 Q Is Mr. Rotem the person who was credited  
8 with -- as producer on the "Blackout" album?

9 A I believe he is, sir.

10 Q When did the album get released?

11 A I believe it was October of 2007, sir.

12 Q When were -- when did the song selection  
13 referred to in this subparagraph 18(b) take place?

14 A Sometime in October 2007, sir.

15 Q Do you recall what the choices were of songs  
16 that you assisted in selecting?

17 A I didn't assist in selecting. I assisted in  
18 having Britney contact the label in order to give her a  
19 selection, too.

20 Q So was -- did -- strike that.

21 Was it your understanding at this time that  
22 Ms. Spears selected which songs would go in the album?

23 A Yes, sir.

24 Q Was it her choice or the producer's choice to  
25 the best of your knowledge?



1 A I can't recall at the moment, sir.

2 Q Okay. So you assisted in song -- song  
3 selection by making sure Ms. Spears communicated with the  
4 producer or the label what she wanted?

5 A I believe so, sir.

6 Q Subparagraph(c) of 8 -- paragraph 18 of  
7 Exhibit 307 states that you "advised and consulted with  
8 Britney on the artwork for the album "Blackout.""

9 When did that take place?

10 A That was in October 2007, sir.

11 Q The same month that the album came out?

12 A I can't recall if the album came out in  
13 October, sir.

14 Q So --

15 A It was an estimate.

16 Q -- you're not so sure about your prior  
17 testimony now, correct?

18 A I believe I answered -- I -- I guessed at that  
19 October 2007.

20 Q So you don't recall?

21 A That's correct, sir.

22 Q Did you assist in any way in providing the  
23 artist who did the cover art for the album?

24 A No, sir.

25 Q In what way did you assist or facilitate the

1 selection of cover art?

2 A The artist was sending the art over, and I went  
3 and opened it and displayed it for Britney to view.

4 Q And did she eventually make a selection?

5 A I believe so, sir.

6 Q Did you make a recommendation?

7 A No, sir.

8 Q Subparagraph 18(d) reads that you, quote,  
9 "coordinated, scheduled and escorted Britney to all photo  
10 shoots and promotional events relating to her album  
11 "Blackout"" close quote.

12 Do you see that?

13 A Yes, sir.

14 Q Did you select the photographer that was used  
15 for the photo shoots?

16 A No, sir.

17 Q Who was the photographer or photographers?

18 A I can't recall their names, sir.

19 Q Was there more than one?

20 A I believe so, sir.

21 Q Where were they located?

22 A I'm not sure, sir. The label handled all of  
23 that.

24 Q Where the photo -- where did the photo shoots  
25 take place?

1 A I recall one of them at a soundstage somewhere  
2 in Santa Monica.

3 Q And that was selected by the label or someone  
4 else?

5 A By the label, sir.

6 Q What promotional events did you help coordinate  
7 concerning the album "Blackout"?

8 A That -- I didn't -- I helped coordinate getting  
9 Britney to that soundstage that day. The photo shoot was  
10 in relation to promotion for the -- for the album, sir.

11 Q Were there any other promotional events that  
12 are -- that are referenced in Exhibit -- excuse me,  
13 paragraph 18(d) of Exhibit 307 other than what you've  
14 just told us about?

15 A At times, music videos are considered  
16 promotional events, sir.

17 Q Okay. Well, you discuss music videos  
18 separately later.

19 Other than music videos and the one photo  
20 shoot, were there any promotional events that -- for the  
21 album "Blackout" that you, quote, "coordinated, scheduled  
22 and escorted" Ms. Spears to?

23 A Not that I can recall, sir.

24 Q Para -- subparagraph 18(e) as in "Edward" reads  
25 that you, quote, "coordinated and consulted with Britney

1 in connection with the music video for album "Blackout."

2 How many music videos were there for the album  
3 "Blackout"?

4 A At the time I was around, there was only one,  
5 sir -- uh, there was one done prior that wasn't official.

6 Q I'm -- just -- could you explain what you mean  
7 by --

8 A I'm sorry. There -- yeah, there was --

9 Q Let me finish my question.

10 A Okay.

11 Q I appreciate you want to help, but we need a  
12 clear record.

13 When you refer to a prior video that wasn't  
14 official, what are you referring to?

15 A Britney had shot a video for the song "Gimme  
16 More."

17 Q What was -- were you there for the shoot?

18 A No, sir.

19 Q Do you know why you weren't there?

20 A I believe it was during that time frame I was  
21 gone, sir.

22 Q Meaning September of 2007?

23 A To the best of my knowledge it was, yes, sir.

24 Q When you were gone in September 2007, am I  
25 correct, sir, that you felt that Ms. Spears had acted

1 Q Who was the choreographer that was in Britney's  
2 mind?

3 A Jamie King, sir.

4 Q Did he do any prior tours -- did he act as her  
5 choreographer previously?

6 A I don't recall, sir.

7 Q You had nothing to do with his selection,  
8 correct?

9 A That's correct, sir.

10 Q Were any other choreographers interviewed other  
11 than him?

12 A Not that I could recall, sir.

13 Q When was the tour planned for?

14 A I don't know, sir.

15 Q When you were involved with Ms. Spears up to  
16 February 1, 2008, was there ever a tentative date for a  
17 tour?

18 A No, sir. There -- she discussed wanting to go  
19 on tour, and I advised her that she needed to have an  
20 agent and an -- an attorney at the time in order to do  
21 so.

22 Q And she didn't have either?

23 A That's correct, sir.

24 Q And as long as you were involved with  
25 Ms. Spears up to February 1, 2008, she never selected a

1 new agent or attorney; is that correct?

2 A That's correct, sir.

3 Q Did you recommend that she hire Mr. Passman?

4 A I believe so, sir.

5 Q Did you do that in writing?

6 A Not that I can recall, sir.

7 Q Other than saying that she didn't think she  
8 could afford Mr -- Mr. Passman, did Ms. Spears ever tell  
9 you why she didn't engage him while you were involved  
10 with her?

11 A Not that I can recall, sir.

12 Q Did you ever attempt to negotiate the terms of  
13 Mr. Passman's engagement?

14 A No, sir.

15 Q Did you ever attempt to -- strike that.

16 Did you ever submit any alternative agents for  
17 Ms. Spears other than CAA?

18 A Not that I can recall, sir.

19 Q Did you ever contact any other agencies to be  
20 possibly agenting -- strike that.

21 Did you ever contact any other agents other  
22 than agents at CAA to possibly represent Ms. Spears?

23 A I may have, but I can't recall at the moment,  
24 sir.

25 Q Do you know of anything that would refresh your

1 recollection?

2 A No, sir.

3 Q As you sit here now, you can't think of the  
4 name of any other agent or agencies you contacted for  
5 possible representation of Ms. Spears; is that correct?

6 A Yes, sir.

7 Q Did Ms. Spears tell you why she didn't want to  
8 select CAA.

9 A She didn't tell me that she didn't want to,  
10 sir.

11 Q Did she ever tell you why she wasn't selecting  
12 CAA?

13 A I don't recall, sir.

14 Q Was Ms. Spears too distracted with her custody  
15 and other matters to focus on selecting a talent agent  
16 at -- up till February 1, 2008?

17 A That may have been one of her reasons, sir --

18 Q So she --

19 A -- but I can't speak for her.

20 Q Did she ever tell you -- strike that.

21 To your observation, was Ms. Spears ever  
22 distracted by her custody disputes at the end of 2007,  
23 early 2008?

24 A There were moments where it appeared so, sir.

25 Q Let's go back to the Complaint, Exhibit 307,

1 shoots, music videos and public appearances."

2 Do you see that in the Complaint?

3 A Yes, sir.

4 Q Who was selected to do the hair and makeup?

5 A There were several different hair and makeup  
6 stylists throughout the entire time I was with her, sir.

7 Q Who were the hair and makeup professionals that  
8 are referenced in this portion of your Complaint?

9 A I can't recall all of their names. There were  
10 several ones. I remember Kim Kimble. One of the guys  
11 for makeup was Sammy. Uh, there was -- there were  
12 several of them, sir. I can't recall any specific names  
13 at the moment.

14 Q Did you bring any of these potential hair and  
15 makeup professionals to Britney Spears's attention?

16 A Did I bring them?

17 Q Did you -- did these recommendations come from  
18 you?

19 A They may have, sir.

20 Q Well, which ones?

21 A I don't recall, sir.

22 Q Do you -- as you sit here now, do you recall  
23 bringing a hair or makeup professional to Ms. Spears and  
24 say, "You ought to hire this person"?

25 A I can't recall doing it like that, sir. I



1 Q You can't think of any right now?

2 A That's correct, sir.

3 Q What public appearances are you referring to in  
4 paragraph 18(k) of Exhibit 307? It's on line 25.

5 A Um, I can't recall at the moment, sir.

6 Q Paragraph 18(l) on Exhibit 307 states that you,  
7 quote, "advised Britney with regard to potential charity  
8 opportunities and escorted Britney to charity  
9 appearances" close quote.

10 Do you see that?

11 A Yes, sir.

12 Q What charity appearances are you referring to?

13 A I can't recall at the moment, sir.

14 Q Were there any?

15 A There may have been.

16 Q Do you recall any?

17 A Not at -- at the moment, sir.

18 Q Also -- that subparagraph also refers to  
19 potential charity opportunities.

20 What potential charity opportunities did you  
21 advise Ms. Spears about during that period of time?

22 A She had charitable foundations prior to me  
23 coming along that we had discussed, sir.

24 Q So you discussed with Ms. Spears her existing  
25 charitable foundations; is that correct?

1 A That's correct, sir.

2 Q How many found -- charitable foundations did  
3 Ms. Spears have from the time you first met her in 2007  
4 through January 2008?

5 A I can't recall a number, sir.

6 Q Was it more than one?

7 A It may have been, sir. I don't know.

8 Q Do you have a recollection if it was more than  
9 one?

10 A Not at the moment, sir.

11 Q Who headed up her charitable foundation in that  
12 period of time?

13 A I can't recall, sir.

14 Q Did she have a staff?

15 A I don't believe so, sir.

16 Q Do you remember the name of her charitable  
17 foundation?

18 A Not at the moment, sir.

19 Q Subparagraph 18(m) as in "Mary" of Exhibit 307  
20 on page 4 states that you, quote, "scheduled, coordinated  
21 and escorted Britney to business meetings with her agents  
22 and Business Manager" close quote.

23 Who are the agents that are referenced in that  
24 portion of your Complaint, sir?

25 A Label executive agents, CAA, I believe. That's

1 A Like, four or five.

2 Q How many of those meetings do you recall

3 Mr. Grossman attended personally?

4 A I can't recall, sir.

5 Q Did those meetings continue with Mr. Grossman

6 through January of 2008?

7 A They may have, sir.

8 Q And that's your best recollection?

9 A I -- yes, sir.

10 Q Other than at the meetings, were you provided

11 with any financial information -- strike that.

12 Other than the four or five meetings with  
13 Mr. Grossman or someone from Mr. Grossman's staff, were  
14 you ever provided with financial information concerning  
15 Ms. Spears's income or expenses?

16 A I may have, sir.

17 Q Do you recall doing that?

18 A Not at at moment, sir.

19 Q You weren't given regular income reports, were  
20 you?

21 A Not that I could recall at the moment, sir.

22 Q Do you know of anything that would refresh your  
23 recollection?

24 A Not at the moment, sir.

25 Q Did Mr. Grossman or his office at the four or

1 me when you first introduced the idea of having a  
2 five-year contract with Britney Spears?

3 A I can't recall the first time. It may have  
4 been sometime in July of 2007, and sometime in the first  
5 week of October, I believe I -- I brought it up again,  
6 sir.

7 Q Okay. And Ms. Spears at some point in time  
8 communicated to you that she didn't want a five-year  
9 contract but she'd want a four-year contract?

10 A That's correct, sir.

11 Q And you believe that occurred on October 13th,  
12 2007; is that right?

13 A Correct, sir.

14 Q Getting back to your meeting with Blair Berk,  
15 I'm a little uncertain of your testimony. So I might go  
16 over the same area again for a second.

17 Did you -- is it your best recollection that  
18 when you met with Blair Berk in the first half of 2008  
19 and she -- she handed you Exhibit 4A, which had been  
20 recovered from the car that you had been using?

21 A Yes, sir.

22 Q Okay. And on that occasion, you told Ms. Berk  
23 that Exhibit 4A represented a Contract between you and  
24 Britney Spears?

25 A Yes, sir.

1 A Yes, sir.

2 Q How long after that first conversation with  
3 you, that first order, that she gained --

4 A I recall it just being a few days.

5 Q A few days means one or two?

6 A No. It was probably around a week.

7 Q So for the first week after you moved in with  
8 Ms. Spears, she had no visitation rights with her  
9 children?

10 A If I am correct, if it was a week, that's  
11 correct, yes.

12 Q Okay. And after that, she gained one monitored  
13 visit overnight with her children?

14 A I don't remember if it was an overnight right  
15 away. I think there was monitored visits in the day,  
16 which later turned to overnights, but I can't recall.

17 Q At it was -- it was first just once a week; is  
18 that correct?

19 A That's cor -- uh, the overnights were just once  
20 a week.

21 Q Okay. Did Ms. Spears, during this period of  
22 time, that is, the first half of October 2007, express  
23 concern that she was not able to see her children more  
24 frequently than was allowed by the court?

25 A Well, she knew that the -- the harder she

1 worked, that meeting all these demands that the court had  
2 placed on her, the more that she would see her children.

3 Q Did she ever tell you that she was under stress  
4 or frustrated or depressed because she wasn't able to see  
5 her children more?

6 A I don't recall her using those words, but it  
7 may have appeared that she was under that type of stress,  
8 sir.

9 Q This is the first half of October 2007,  
10 correct?

11 A That's correct, sir.

12 Q How did it manifest itself to you, the stress  
13 Ms. Spears was exhibiting at that point in time?

14 A Well, it's bothersome, I would believe, for any  
15 mother that wasn't able to see her children, sir.

16 Q I understand that. What I'm saying is what do  
17 you recall seeing or observing Ms. Spears say or do that  
18 caused you in the first half of 200- -- October 2007 to  
19 conclude that she was under stress?

20 A Well, I didn't even need to see that, sir. I  
21 was with her 24/7, and there was a long list of things  
22 and activities that the court required needed to be done.  
23 I was under that stress as well. There was a lot going  
24 on. But she was pulling it off. It seemed like we were  
25 doing a pretty good job.

DEPOSITION OFFICER'S CERTIFICATE

STATE OF CALIFORNIA )  
 ) ss.  
COUNTY OF LOS ANGELES )

I, Vivian Lane, hereby certify:

I am a duly qualified Certified Shorthand Reporter, in the State of California, holder of Certificate Number CSR 11339 issued by the Court Reporters Board of California and which is in full force and effect. (Bus. & Prof. § 8016)

I am not financially interested in this action and am not a relative or employee of any attorney of the parties, or of any of the parties. (Civ. Proc. § 2025.320(a))

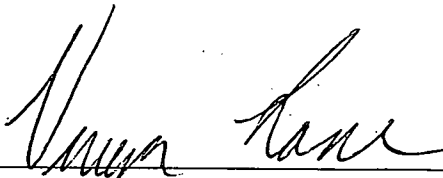
I am authorized to administer oaths or affirmations pursuant to California Code of Civil Procedure, Section 2093(b) and prior to being examined, the deponent was first placed under oath or affirmation by me. (Civ. Proc. §§ 2025.320, 2025.540(a))

I am the deposition officer that stenographically recorded the testimony in the foregoing deposition and the foregoing transcript is a true record of the testimony given. (Civ. Proc. § 2025.540(a))

1 I have not, and shall not, offer or provide  
2 any services or products to any party's attorney or  
3 third party who is financing all or part of the action  
4 without first offering same to all parties or their  
5 attorneys attending the deposition and making same  
6 available at the same time to all parties or their  
7 attorneys. (Civ. Proc. § 2025.320(b))

8 I shall not provide any service or product  
9 consisting of the deposition officer's notations or  
10 comments regarding the demeanor of any witness,  
11 attorney, or party present at the deposition to any  
12 party or any party's attorney or third party who is  
13 financing all or part of the action, nor shall I collect  
14 any personal identifying information about the witness  
15 as a service or product to be provided to any party or  
16 third party who is financing all or part of the action.  
17 (Civ. Proc. § 2025.320(c))

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19 Dated: December 5, 2011

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I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 1875 Century Park East, 23rd Floor, Los Angeles, California 90067.

**SEE ATTACHED SERVICE LIST**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

  
Bonita D. Moore

**SERVICE LIST**  
**Lutfi v. Spears**  
**Case No. BC 406904**

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